



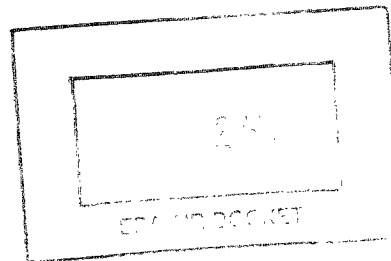
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GATX TERMINALS CORPORATION

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July 21, 1999

Environmental Protection Agency
The Docket Clerk
Air and Radiation Docket and Information Office
401 M St. SW
Room M-1500 (Mail Code 6102)
Washington, DC 20460



RE: Comments on Notice of receipt of petition for delisting of methyl ethyl ketone (MEK) from list of HAP's, Federal Register June 23, 1999

Dear Sirs:

GATX Terminals Corporation is pleased to submit comments in response to the above-referenced action.

GATX Terminals Corporation provides one of the largest independent bulk liquid storage and distribution systems in the world. GATX Terminals Corporation owns and operates twenty (20) terminals in the United States. GATX Terminals Corporation's facilities function as vital links in the nationwide distribution of petroleum and chemical products, providing an interface among virtually all modes of transportation, and has experience in the storage and handling of MEK at several of its terminals.

GATX Terminals Corporation supports the Chemical Manufacturers Association's (CMA) petition to delist MEK from the list of hazardous air pollutants (HAPs). GATX Terminals Corporation has stored and handled MEK for many years, and has not experienced any specific employee health-related issues or community complaints as a result of storing this product. GATX believes that control technologies of the type required in EPA's 40 CFR Part 63 MACT rules should only apply to those hazardous chemicals that justify controls on the basis of human health and other environmental impacts. In addition, many of the states in which our terminals are located which store MEK have adopted reasonably available control technology (RACT) regulations which already serve to significantly reduce emissions and potential human health and environmental impacts from products like MEK. CMA's petition discusses these impacts and provides technical cogent justification for delisting MEK in detail.

In summary, GATX Terminals Corporation supports EPA's effort for technical evaluation of CMA's petition to delist MEK.

Very truly yours,

Matthew E. Marra
Director of Environmental Process
Quality Control

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